

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
)
)
v.) Docket No. 5:18-cr-61
)
)
SAM BENT and DJENEBA BENT,)
Defendants.)

**SECOND PARTIALLY STIPULATED MOTION FOR ONE WEEK
EXTENSION TO RESPOND TO MOTION TO SUPPRESS**

The United States of America requests a second one-week extension to respond to the pending motion to suppress (doc. 22) filed by defendant Sam Bent and, related to which, Djeneba Bent has filed a motion to join (doc. 24). After its first motion for a one week extension was granted last week, the Government's response is due tomorrow, Tuesday, February 26. The undersigned requests an additional week. As previously noted, the motion is 20 pages, nearly single-spaced, and raises several issues, some of which are novel. This second request is in part due to the need for a factual investigation greater than previously anticipated. The requested extension will enable the undersigned to prepare an opposition that should facilitate the fair and just resolution of the potentially serious issues raised by the motion.

Defendants will not be prejudiced by the granting of this motion. Neither is in custody, and this Court granted three motions to extend the time for Defendants

to prepare motions (docs. 17, 19, and 21). Counsel for defendant Djeneba Bent, David McColgin, has advised he stipulates to the requested extension. The office for counsel for Sam Bent, Stephanie Greenlees, has advised the undersigned that she is currently not in the office. Accordingly, Attorney Greenlees has not yet responded to a request to stipulate to the granting of this motion.

Accordingly, the United States requests its deadline for responding to the pending motions be extended to Tuesday, March 5, 2019.

Respectfully submitted, this 25th day of February, 2019.

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN
United States Attorney

By: /s/ *Michael P. Drescher*
Michael P. Drescher
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Michael.Drescher@usdoj.gov